

**REMARKS**

Claims 1-73 are pending, with claims 1, 19, 23 and 26 being independent.

Reconsideration and allowance of the above-referenced application are respectfully requested.

**Rejection of Claims - 35 U.S.C. §§ 102 & 103:**

Claims 1-10, 12-35, 37-51, 53-66, and 68-73 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by US Pat. No. 6,239,792 to Yanagisawa et al. Claims 11, 36, 52, and 67 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Yanagisawa et al. in view of US Pat. No. 7,006,711 to Dresevic et al. These contentions are respectfully traversed.

The 35 U.S.C. §§ 102 & 103 subsection of the Remarks section of the 3-20-2008 Response filed previously is hereby incorporated by reference. In addition, the Response to Arguments section of the 6-23-2008 Final Office Action are addressed herein. The Office has again noted that Yanagisawa et al. describe an erasure mode in which an erasure area along a trace is formed by coupling erasure areas corresponding to consecutive input points, where the size of the erasure area is changed based on the motion speed obtained from the coordinate data of input points, and then concludes with:

Thus, during erasure mode the motion of the pen over consecutive input points, which were previously input to define a trace, is tracked to identify areas surrounding the consecutive input points. The identified areas are erased from the screen (col. 5, ll. 2-5). Hence, movement of the pen, during erasure mode, from one input point to an input point one sampling point before (col. 4, ll. 35-40) suggests a backward motion along the original trace. Therefore, Yanagisawa et al. teach "detecting a backward motion between a first and a second location in

the path if the first location's tracking zone overlaps with the second location's tracking zone.<sup>1</sup>

With all due respect to the Office, it should be noted that the above conclusory statements do not indicate in any way how Yanagisawa et al. can be considered to teach the use of overlapping tracking zones as respectively required in each of independent claims 1, 19, 23 and 26. It is further respectfully suggested that this failure to provide a rational basis for drawing the conclusion that Yanagisawa et al. anticipates the use of overlapping tracking zones stems from the fact that Yanagisawa et al. does not teach or suggest the presently claimed subject matter of the respective independent claims. Thus, each of independent claims 1, 19, 23 and 26 should be in condition for allowance.

Moreover, since Dresevic et al. fail to cure the noted deficiency of Yanagisawa et al., each of dependent claims 11, 36, 52, and 67, as well as each of dependent claims 2-10, 12-18, 20-22, 24, 25, 27-35, 37-51, 53-66 and 68-73 should be patentable based on their respective base claims and the additional recitations they contain.

For example, each of claims 6, 31, 48 and 63 require specification of "a tracking zone that is inside the influence region of the location and outside the influence region of the previous location." A detailed example of this claimed subject matter is provided in the present application's description of FIGs. 2A-2F. The cited portions of Yanagisawa et al. (col. 4, lines 10-26, and col. 6, lines 5-25) describe the use of an erasure area or a drawing area (depending on the selected mode) having a specified shape, such as a circle, "square, ellipsoid, rhombus, and the like." Nothing in Yanagisawa et al. describes specifying a tracking zone that is inside the influence region of the location and outside the influence region of the previous location, as

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<sup>1</sup> See 6-23-2008 Final Office Action at page 12.

respectively recited in claims 6, 31, 48 and 63. Thus, each of these claims should be allowable for at least this additional reason. Similar arguments were presented in the 3-20-2008 Response, and although the Office notes that "Applicant's arguments filed 3/20/08 have been fully considered"<sup>2</sup>, the undersigned attorney cannot find where these prior arguments have been addressed in the 6-23-2008 Final Office Action.

In order to clarify the bases for maintaining the rejections of claims 1 and 6, the undersigned attorney scheduled a telephone interview with examiner Harrison for August 7, 2008. Unfortunately, examiner Harrison was not available to receive the call at the scheduled time. After reviewing this Response, and should examiner Harrison be of the opinion that the rejections should be maintained, a telephone interview is respectfully requested to address the above points, in the hope that an appeal might be avoided.

### Conclusion

The foregoing comments made with respect to the positions taken by the Office are not to be construed as acquiescence with other positions of the Office that have not been explicitly contested. Accordingly, the above arguments for patentability of a claim should not be construed as implying that there are not other valid reasons for patentability of that claim or other claims.

A formal notice of allowance is respectfully requested. In the absence of such, a telephone interview with the Examiner and the Examiner's supervisor is respectfully requested to discuss claims 1 and 6 of the present application in light of the rejections of record.

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<sup>2</sup> See 6-23-2008 Final Office Action at page 12.

Applicant : Sambit Dash  
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No fees are believed due with this response. Nonetheless, please apply any necessary charges or credits, to deposit account 06-1050.

Respectfully submitted,

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William E. Hunter  
Reg. No. 47,671

Fish & Richardson P.C.  
PTO Customer No. 21876  
Telephone: (858) 678-5070  
Facsimile: (877) 769-7945

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